From: Smith, Monica

To: Phillips, Pam; Broyles, Ragan; Petersen, Chris; Webster, Susan; Ruhl, Christopher; Edlund, Carl

Subject: RE: West Explosion

**Date:** Thursday, April 18, 2013 12:30:08 PM

In response to Carl's question about follow up inspections. In talking with Bob this morning, he stated that we had not followed up with them as a result of the inspection in 2006. He stated that it was not a high risk facility. He stated that we were trying to make our way through the list of RMP facilities before we went back unless they were High Risk or had a release/incident.

The following is from Bob's email: Why no inspections since 2006?

There are currently 2292 RMP facilities in the Region. We are able to conduct 150 – 200 inspections per year. Our targeting strategy puts non High Risk facilities (of which West Fertilizer is one) on the potential inspection list after 5 years without an inspection. Priority is to inspect previously uninspected facilities, so this was not retargeted.

Monica Smith US EPA Region 6 Superfund Division (6SF-PC) Enforcement & Regulatory Compliance Group 1445 Ross Avenue Dallas, TX 75202-2733 214-665-6780 office 469-766-3398 cell 214-665-6660 fax

-----Original Message-----From: Phillips, Pam

Sent: Thursday, April 18, 2013 12:24 PM

To: Broyles, Ragan; Petersen, Chris; Webster, Susan; Ruhl, Christopher; Smith, Monica

Subject: Fw: West Explosion

From: Edlund, Carl

Sent: Thursday, April 18, 2013 12:16:12 PM

To: Phillips, Pam; Gray, David Cc: Blevins, John; Coleman, Sam

Subject: West Explosion

I'm sitting on tarmac (my flight delayed) and got a call from HQ press folks. They wanted background on the RMP violation of 2006. I verified that there had been a fine because of an inadequate RMP and that the facility reported that it had corrected the problem. They wanted to know if there was a follow up inspection to verify compliance and I said I didn't know but that Pam would know or find out.

I also was able to explain that this was not a major air source (they called Blevins first) and it wasn't a 'high risk' minor facility either.

In follow up, it would be good if we have some metrics on the dimensions of the problem....XX,000 facilities total, Y,000 major, Z,000 minor but still high risk, QQ,000 minor but still potential risk (which I ThiNK is the catagory for this place).